

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of

Protecting and Promoting the Open Internet

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Docket No. 17-108

SHIELD EDGE TECHNOLOGIES  
COMMENTS REGARDING  
PROPOSED RULEMAKING

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1 Overview

The Internet was developed as a way to connect a network of networks. It is a distributed networking model that can survive a disaster: specifically a nuclear attack. Because of this disaster minded resilience, other physical disaster mitigation has been woven into the basic design of the network. These physical disasters make the network resilient from physical attacks, but do not, by themselves, have any structure that protects against impediments to traffic through programmatic means.

Because of this, open connectivity is put at threat by multiple vectors that are emerging in our current world, one of which is the competing interest of ISPs that have conflicts with content of providers whose traffic runs across their nodes.

The attempt to keep this conflict from effecting the unfettered flow of packets from and to end points (consumers), the FCC attempted to adjust to the climate of mergers in this space by passing the "Open Internet Order." This was struck down as the framework for supporting it was not supported in current law under ISPs then classification not as common-carrier services. Broadband ISPs were then re-classified under Title II so that protections could be placed and still stay within the framework of current law (since law was not keeping up with the Internet).

On May 18<sup>th</sup> the FCC voted in favor of removing the current classification under Title II and returning to a point where the "Open Internet Order" protections could not be applied. This presents a real and immediate danger to the small business community in their attempts to use and encourage non-carrier ingratiated technologies to disrupt and advance the productivity growth of the American economy.

**2 The role the Internet plays for Shield Edge Technologies**

- 2.1 I service small businesses in the Southern Indiana area and use the Internet every single day to bring solutions to those small businesses that help them compete with much larger businesses. I support them remotely using different types of technologies, not all of which are mainstream, but all of which have a profound impact on my ability to serve my clients well.
- 2.2 I use the Internet to educate myself on the various technologies that are available and the technologies that are being developed
- 2.3 I use the Internet to track down the latest threats to my clients networks and computers and research ways of combating those threats
- 2.4 I use the Internet for communications, both text based and voice based.

### 3 Threats to the Internet

#### 3.1 Direct consumer and business interference from hostile entities

##### 3.1.1 Ransomware

##### 3.1.2 Spyware

##### 3.1.3 Botnets

##### 3.1.4 Other malware

Present a very real threat to the ability of consumers and businesses to operate without restriction on the Internet. This includes, but is not limited to, intentional denial of services for ransom, unintentional denial of services due to excessive traffic from infected systems, redirection of traffic causing either a delay or a denial and an infection vector.

#### 3.2 Indirect consumer and business Interference from hostile entities

##### 3.2.1 Denial of Service

##### 3.2.2 Redirected Traffic

Causes either a denial of accessibility, a significant delay, or an introduced infection vector to a direct disruption.

#### 3.3 Direct ISP interference (exercising ISP preference)

##### 3.3.1 IP Packets to non-preferred sites are delayed or denied causing productivity loss

##### 3.3.2 IP packets to non-preferred sites are delayed or denied causing a market disruption and a market skew toward the vendors or content that the ISP chooses

##### 3.3.3 IP packets to preferred services are given a higher priority causing new services to be unable to compete with established services at the same bandwidth therefore stifling new innovations and reducing disruption and advancement of the market.

##### 3.3.4 IP packets of certain customers are given a higher priority than others which introduces a competition blocking mechanism by which those more established companies can buy their way to better performance without having to innovate on a level playing field thereby stifling innovation and younger startup companies without as much cash.

#### 3.4 Government Interference impeding the free and open transmission and receipt of packets

##### 3.4.1 Free access to information is an outgrowth of free speech. Those governments around the world that stifle free access to speech also stifle free access to information. We have seen International companies of U.S. Origin whose leadership strongly disagree with censorship place technologies on their services that do exactly that to appease governments whose free speech protections are weak or non-existent.

##### 3.4.1.1 The ability for the communication, organization, and free assembly of peoples would be put at risk

3.4.1.2 The ability of the nation to search for and find truth would be severely harmed.

3.4.1.3 The ability of the state to control the method and message would be greatly enhanced and the freedom of the people for whom the government serves would be put at risk.

#### **4 The role the Internet plays for me personally**

4.1 My child, up until this year, was home-schooled and her education relied heavily on the accessibility of information and services found on the Internet

4.2 My child is now enrolled in a New Tech school that requires access to the Internet to research, keep track of and submit my child's work

#### **5 Conclusion**

5.1 Because of the threats presented to my company, me personally, and the economy of the U.S., we need to be able to enforce an open and free flow of all packets from endpoint to endpoint anywhere the U.S. Has jurisdiction and control.

Notes:

Because it still applies, please see the original EFF comment filing for the 2014 consideration of the GN docket No. 14-28:

<https://www.eff.org/files/2014/07/15/effcccomments7152014.pdf>